

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MATTHEW LEIPOLT
CHRISTOPHER ADAMS, et al.,

Plaintiff,

Case No. 15-CV-628

v.

ALL-WAYS CONTRACTORS INC.,

Defendant.

**OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL AND
NOTICE OF MOTION AND MOTION FOR PROTECTIVE ORDER**

Defendant hereby responds to the Plaintiffs' Motion to Compel discovery filed with this Court on December 21, 2015 and moves pursuant to Federal Rule of Civil Procedure 26(c) for a Protective Order forbidding the sought after discovery requests.

This Motion is based on the attached Memorandum of Law, the Declaration of Thomas Krukowski, and the contemporaneously filed Motion for Summary Judgment.

Dated this 6th day of January, 2016.

/s/ Thomas P. Krukowski

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